

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *All Actions*

**DECLARATION OF ROBERT T. HAEFELE IN SUPPORT OF
PLAINTIFFS' EXECUTIVE COMMITTEES' OPPOSITION
TO THE CHARITY OFFICIAL DEFENDANTS' AND SOLIMAN
AL-BUTHE'S MOTIONS FOR PROTECTIVE ORDERS**

Robert T. Haeefe declares, under penalty of perjury, as follows:

1. I am an attorney admitted to practice in the above-captioned matter, a member of the Plaintiffs' Executive Committees ("PECs") in this MDL, and associated with the law firm Motley Rice LLC, counsel for plaintiffs in this MDL. I submit this Declaration to transmit to the Court the following documents, which are being submitted in support of the PECs' Opposition to the Motions of Defendants Abdullah Bin Saleh Al-Obaid, Abdullah Abdul Mohsen Al-Turki, Adnan Basha, and Abdullah Omar Naseef ("the Charity Official Defendants") and Defendant Soliman al-Buthe (all collectively, "Defendants") for Rule 26(c)(1) Protective Orders [ECF Nos. 4073 and 4074, respectively].

2. Attached hereto as Exhibit A is a true and correct copy of the PECs' February 6, 2018 letter to Defendants' counsel (including Alan Kabat, counsel for individual defendants Al-Buthe, Naseef, Al-Obaid, Al-Turki and Basha) conveying a list identifying sixteen priority party and nonparty witnesses whose depositions Plaintiffs sought to coordinate in blocks, consistent with Paragraphs 25 and 26 of the Court's Deposition Protocol (ECF No. 3894).

3. Attached hereto as Exhibit B is a true and correct copy of Alan Kabat's February 12, 2018 letter to Sean Carter responding to the PECs' February 6, 2018 letter, to request

clarification on two points—the location of the depositions and the dual depositions of several individual defendants.

4. Attached hereto as Exhibit C is a true and correct copy of the PECs' February 13, 2018 letter to Alan Kabat responding to Alan Kabat's February 12, 2018 letter requesting clarification.

5. Attached hereto as Exhibit D is a true and correct copy of Alan Kabat's February 26, 2018 letter to Sean Carter regarding the availability of Defendants Al-Turki, Al-Obaid, Naseef, and Basha for depositions.

6. Attached hereto as Exhibit E is a true and correct copy of Alan Kabat's April 16, 2018 letter to Sean Carter regarding the availability of Defendants Al-Turki, Al-Obaid, Naseef, and Basha for depositions.

7. Attached hereto as Exhibit F is a true and correct copy of Alan Kabat's April 16, 2018 letter to Sean Carter regarding the availability of Defendant Al-Buthe for depositions.

8. Attached hereto as Exhibit G is a true and correct copy of the PECs' June 4, 2018 cover letter to Alan Kabat accompanying Notices of Deposition for Defendants Basha, Naseef, Al-Obaid, Al-Turki, and Al-Buthe.


9. Attached hereto as Exhibit H is a true and correct copy of Alan Kabat's June 8, 2018 letter to Sean Carter in response to the PECs' June 4, 2018 cover letter and Notices of Deposition for Defendants Al-Turki, Al-Obaid, Naseef, and Basha.

10. Attached hereto as Exhibit I is a true and correct copy of Alan Kabat's June 8, 2018 letter to Sean Carter in response to the PECs' June 4, 2018 cover letter and Notice of Deposition for Defendant Al-Buthe.

11. Attached hereto as Exhibit J is a true and correct copy of the PECs' July 9, 2018 letter to Alan Kabat in response to Alan Kabat's June 8, 2018 letters concerning the depositions of Defendants Al-Turki, Al-Obaid, Naseef, Basha, and Al-Buthe.

12. Attached hereto as Exhibit K is a true and correct copy of Alan Kabat's July 20, 2018 letter to Sean Carter regarding the availability of Defendants Al-Turki, Al-Obaid, Naseef, and Basha for depositions.

Executed in Mount Pleasant, South Carolina, on August 8, 2018.


/s/ _____
Robert T. Haefele, Esq.